

DECLARATION OF JARRON FARMBY

I, Jarron Farmby, declare as follows:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"). I have knowledge of the facts set forth herein and could and would testify to those facts fully and truthfully if called and sworn as a witness. Because I am making this declaration for the limited purpose of addressing issues raised in the government's Motion to Empanel an Anonymous Jury, I have not included every fact known to me concerning this investigation.

2.

A horizontal bar chart with 18 black bars. The y-axis is labeled with numbers 11 through 28. Bars 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, and 27 are full-length, while bar 28 is significantly shorter.

Row	Value
11	Full
12	Full
13	Full
14	Full
15	Full
16	Full
17	Full
18	Full
19	Full
20	Full
21	Full
22	Full
23	Full
24	Full
25	Full
26	Full
27	Full
28	Short

1       3. Based on my review of an FBI criminal history report for  
2 defendant Deandre Wilson, defendant Wilson was convicted in Illinois  
3 state court of misdemeanor Possession of a Firearm on or about  
4 October 1, 2010. I also know that Wilson was charged with a 2014  
5 murder in Illinois state court and was found not guilty in or around  
6 July 2023.

7       4. Based on my review of an FBI criminal history report for  
8 defendant Asa Houston, defendant Houston was convicted in Illinois  
9 state court of at least the following: (i) Armed Carjacking on or  
10 about March 3, 2010; (ii) Aggravated Battery with Great Bodily Harm  
11 on or about July 13, 2011; and (iii) Felon in Possession of a Firearm  
12 on or about March 5, 2008, May 8, 2017, and August 22, 2023.

13       5. Based on my review of certified conviction records for  
14 [REDACTED], [REDACTED] was convicted in [REDACTED] state of [REDACTED]  
15 [REDACTED] on or about [REDACTED].

16       6. Based on my review of an FBI criminal history report for  
17 Only the Family ("OTF") associate [REDACTED]  
18 [REDACTED] was convicted in Illinois state court of Aggravated Battery  
19 with a Firearm on or about [REDACTED].

20       7. Based on my review of an FBI criminal history report for  
21 OTF associate [REDACTED] and open-source  
22 research, [REDACTED] was arrested in or around [REDACTED] and charged  
23 with, among other things, murder, kidnapping, and armed robbery.

24       8. Based on conversations with other law enforcement agents  
25 with knowledge of Chicago-based gangs and open-source research, I  
know that Marcus Smart aka "Muwop" is a member of the O-Block street  
gang and associate of defendant Durk Banks and OTF, including having  
appeared in at least two of Banks' music videos. On or about January

1 17, 2024, Smart was convicted by jury of racketeering offenses,  
2 including murder, in the Northern District of Illinois.

3 9. Attached as **Exhibit A** is a true and correct copy of an  
4 audio message seized from a phone belonging to [REDACTED], and sent to [REDACTED]  
5 from a number associated with OTF associate [REDACTED]  
6 [REDACTED]

7 10. Based on my review of an FBI 302 documenting an interview  
8 with [REDACTED] on [REDACTED], I know that [REDACTED] stated the  
9 following:

10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]

16 11. [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26 [REDACTED]  
27 [REDACTED]  
28

1       12. Attached as **Exhibit B (Under Seal)** is a true and correct  
2 copy of a report from the Bureau of Prisons documenting defendant  
3 Banks' possession of a contraband Apple Watch. As noted in Exhibit  
4 A, defendant Banks attempted to damage and/or destroy the device when  
5 he was caught with it. Based on the FBI's investigation, including  
6 data provided by Apple, I know that the serial number of the watch  
7 seized from Banks' person shows that the device was associated with  
8 the Verizon cellular network, was purchased on May 26, 2025, and was  
9 activated the next day. Thus, the device permitted defendant Banks,  
10 and possibly others, to have an unknown number of unmonitored  
11 communications.

12       13. Based on my review of an FBI report from on or about March  
13 6, 2025 and recordings of four voicemails left on a Central District  
14 of California United States Magistrate Judge's chambers line on or  
15 about February 22, 2025, I know that the individual states, among  
16 other things, that defendant Banks and Wilson were innocent and that  
17 "if they get life . . . I'm gonna burn this motherfucker down . . .  
18 burn it to the ground . . . it's not a game bitch."

19       14. Based on my involvement in the investigation and review of  
20 relevant reports, I know that in April 2025, AUSA Yanniello received  
21 a phone call on his USAO desk line from an unknown male caller who  
22 began making threats to AUSA Yanniello, which caused AUSA Yanniello  
23 to begin recording the call. During the call, the unknown male  
24 caller stated "free Durk, or we gonna shoot that motherfucker up."  
25 AUSA Yanniello responded "shoot who up," to which the caller said  
26 "shit, your ass."

27       I declare under penalty of perjury under the laws of the United  
28 States of America that the foregoing is true and correct and that

1 this declaration is executed at Los Angeles, California, on October  
2 6, 2025.

  
JARRON FARMBY

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## EXHIBIT A

[Audio file lodged  
manually]

# EXHIBIT B

[UNDER SEAL]